

PILLSBURY WINTHROP SHAW PITTMAN LLP

Eric Fishman, Esq.
1540 Broadway
New York, New York 10036
Telephone: (212) 858-1000
Facsimile: (212) 858-1500
Michael Evan Jaffe, Esq.
2300 N Street, N.W.
Washington DC 20037-1122
Telephone: (202) 663-8068
Facsimile: (202) 663-8007

JACKSON & CAMPBELL, P.C.

David L. Kelleher, Esq.
1120 Twentieth Street, N.W.
South Tower
Washington D.C. 20036
Telephone: (202) 457-1685
Facsimile: (202) 457-1678
Attorneys for Respondents/Cross Petitioners
Suchodolski Associates, Inc. and Consultora
Worldstar, S.A.

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

CARDELL FINANCIAL CORP. and)
DELTEC HOLDINGS, INC.)
)
Petitioners,)
)
)
v.)
)
SUCHODOLSKI ASSOCIATES, INC. and)
CONSULTORA WORLDSTAR, S.A.)
)
)
Respondents.)
)

Case No. 09-CV-6148-VM

NOTICE OF CROSS PETITION TO VACATE ARBITRATION AWARD

PLEASE TAKE NOTICE that upon the annexed Cross Petition to Vacate Arbitration Award, and the supporting memorandum and exhibits thereto, Respondents, Suchodolski, Inc. and Consultora Worldstar, S.A. by and through their attorneys will move this Court at 500 Pearl Street, Courtroom 20B, New York, New York 10007 for an Order pursuant to the authority of the Federal Arbitration Act, 9 U.S.C. §1, *et seq.*, and the New York Convention of 1958 on the Recognition and Enforcement of Foreign Arbitral Awards, (1) vacating in its entirety the arbitration award issued on April 28, 2009 and delivered to the parties on April 30, 2009 and amended by letter-ruling dated June 8, 2009 (the “Final Award”), American Arbitration Association Case No.: ICDR 50 168 T 322 06 between and among Cardell Financial Corp., Deltec Holdings, Inc., Suchodolski Associates, Inc. and Consultora Worldstar, S.A.; (2) awarding Respondents their costs and attorneys’ fees associated with bringing the Cross Petition; and (3) awarding such other and further relief as is just and proper.

Respectfully submitted,

/S Eric Fishman
Eric Fishman
Pillsbury Winthrop Shaw Pittman LLP
1540 Broadway
New York, New York 10036-4039
Telephone: (212) 858-1745
Facsimile: (212) 858-1500
Email: eric.fishman@pillsburylaw.com

*Counsel for Respondents/Cross Petitioners
Suchodolski Associates, Inc. and Consultora
Worldstar S.A.*

Of Counsel
Michael Evan Jaffe
Pillsbury Winthrop Shaw Pittman LLP
2300 N Street, N.W.
Washington, DC 20037-1122
Telephone: (202) 663-8068
Facsimile: (202) 663-8007
Email: michael.jaffe@pillsburylaw.com

David L. Kelleher
Jackson & Campbell, P.C.
1120 Twentieth Street, N.W.
Washington, D.C. 20036
Telephone: (202) 457-1685
Facsimile: (202) 457-1678
Email: dkelleher@jackscamp.com